

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

**JANE DOE,**

Plaintiff

v.

CIVIL ACTION NO. 6:21-CV-59

**LIBERTY UNIVERSITY, INC., and  
CHARLES TIPPETT**

Defendants

**MOTION TO DISMISS  
OF DEFENDANT CHARLES TIPPETT**

Defendant Charles Tippet, by counsel, pursuant to Rules 10(a) and 12(f) of the Federal Rules of Civil Procedure, moves for dismissal of the Complaint against him. Plaintiff has failed to name all of the parties as required by Rule 10(a), and accordingly all of the Complaint's allegations against this defendant should be stricken pursuant to Rule 12(f), requiring dismissal of the Complaint.

WHEREFORE, for the reasons set forth in the accompanying Memorandum in Support of Motion, this defendant requests that the Complaint against him be dismissed and that he be awarded his costs.

**CHARLES TIPPETT**

/s/ John E. Falcone  
Counsel

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**CERTIFICATE**

I hereby certify that on this 21<sup>st</sup> day of December, 2021 I electronically filed the foregoing Motion with the Clerk of the Court using the CM/ECF system, which will serve plaintiff's counsel via e-mail. I further certify that I have served Liberty University by email.

/s/ John E. Falcone  
Counsel for Defendant Charles Tippet

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